

Plaintiff,

V.

Defendant.

**DECLARATION OF IAN N.
FRIEDMAN, ESQ.**

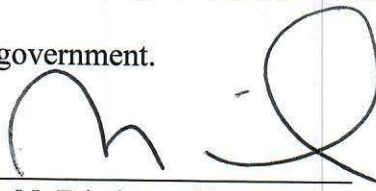
to show dates on which Mr. Lu was active on his server.

7. I objected when the Government introduced Exhibit 13B on the basis that it was not provided in discovery. In response to my objection, the Government represented that the underlying documents were provided to the defense in discovery. Relying on that representation, I withdrew my objection.

8. I also objected when the Government sought to introduce Exhibit 13A on the basis that the purported email notifications/alerts represented in that exhibit were not provided in discovery. In response to my objection, the Government represented that the underlying documents were provided to the defense in discovery. Again, relying on the Government's representation, I withdrew my objection.

9. I do not recall seeing the documents that purportedly constitute Exhibits 13A and 13B in the discovery produced to the defense prior to trial. I have, post-trial, been unable to locate these documents within the discovery provided by the government.

Dated: May 12, 2025
Cleveland, OH



Ian N. Friedman, Esq.